

FILED

MAY 21 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GABRIEL URQUIZA-URQUIZA,
a/k/a "Gabriel Urquiza-Flores,"
LETICIA GARCIA SALAZAR,
DAISY VILLANUEVA,
JAVIER RODARTE,
RICARDO PLATEADO-MARTINEZ,
ELISER BLANCO LOPEZ,
ADAMARIS JIMENEZ,
ROSA MARIA OLMOS,**

Defendants.

Case No. 24-CR-131-JDR

SUPERSEDING INDICTMENT

**[COUNT ONE: 21 U.S.C. §§ 846
and 841(b)(1)(A)(viii) – Drug
Conspiracy;**

**COUNT TWO: 18 U.S.C. § 924(o)
– Firearms Conspiracy;**

**COUNT THREE: 18 U.S.C.
933(a)(1), 933(a)(3), and 933(b) –
Firearms Trafficking;**

**COUNT FOUR: 18 U.S.C.
§ 1956(h) – Conspiracy to Commit
Money Laundering;**

**COUNTS FIVE and SIX: 18 U.S.C.
§§ 1957(a) and 1957(b) – Engaging
in Monetary Transactions in
Property Derived from Specified
Unlawful Activity;**

**COUNT SEVEN: 21 U.S.C.
§§ 841(a)(1) and 841(b)(1)(B)(viii) –
Distribution of Methamphetamine;**

**COUNTS EIGHT and NINE: 21
U.S.C. §§ 841(a)(1) and
841(b)(1)(A)(viii) – Distribution of
Methamphetamine;**

**COUNTS TEN and SEVENTEEN:
21 U.S.C. §§ 841(a)(1) and
841(b)(1)(A)(viii) – Possession of
Methamphetamine with Intent to
Distribute;**

**COUNT ELEVEN: 21 U.S.C.
§§ 856(a)(1) and 856(b) –
Maintaining a Drug-Involved
Premises;**

**COUNT TWELVE: 18 U.S.C.
§§ 922(g)(5)(A) and 924(a)(8) – Alien
Unlawfully in the United States in
Possession of Firearms;**

COUNT THIRTEEN: 18 U.S.C. § 924(c)(1)(A)(i) – Possession of Firearms in Furtherance of a Drug Trafficking Crime;
COUNT FOURTEEN: 50 U.S.C. § 4819 – Illegal Export of Firearms;
COUNT FIFTEEN: 18 U.S.C. § 924(k)(2)(B) – Smuggling Firearms from the United States;
COUNT SIXTEEN: 8 U.S.C. § 1326 – Unlawful Reentry of a Removed Alien;
Forfeiture Allegation: 18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and (B), and 982(a)(1), 21 U.S.C. § 853, 28 U.S.C. § 2461(c) and 50 U.S.C. § 4819(d) – Drugs, Conspiracy, Money Laundering and Firearms Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE
[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

From in or about July 2023 to on or about April 24, 2024, in the Northern District of Oklahoma and elsewhere, the defendants, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” **LETICIA GARCIA SALAZAR**, **DAISY VILLANUEVA**, **JAVIER RODARTE**, **RICARDO PLATEADO-MARTINEZ**, **ELISER BLANCO LOPEZ**, **ADAMARIS JIMENEZ**, and **ROSA MARIA OLMOS**, together and with others known and unknown to the Grand Jury, willfully, knowingly, and intentionally combined, conspired, confederated, and agreed together, each with the other, to commit offenses against the United States as follows:

1. To possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1); and
2. To distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT TWO
[18 U.S.C. § 924(o)]

From in or about January 2024 to on or about April 8, 2024, in the Northern District of Oklahoma and elsewhere, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly and intentionally combined, conspired, confederated, and agreed with other persons, both known and unknown to the Grand Jury, to commit an offense under Title 18, United States Code, Section 924(c)(1), that is, possession of a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, Drug Conspiracy, as more fully set forth in Count One of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(o).

COUNT THREE
[18 U.S.C. §§ 933(a)(1), 933(a)(3), and 933(b)]

From in or about January 2024 to on or about April 8, 2024, in the Northern District of Oklahoma and elsewhere, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” together with others known and unknown to the Grand Jury, knowingly shipped, transported, transferred, caused to be transported, and otherwise disposed of one or more of the following firearms to another person in and affecting interstate and foreign commerce, and conspired and attempted to do so, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony:

1. An Inter Ordnance (IO) Inc, Model 10-15, multi-caliber semi-automatic pistol, serial number 1015-02197;
2. An Anderson Manufacturing, Model AM-15, multi-caliber semi-automatic rifle, serial number 21121908;
3. A Beretta, Model 92F, 9mm semi-automatic pistol, serial number BER137788Z;
4. A Browning, Model SA-22, .22 Caliber semi-automatic rifle, serial number 10940RN146;
5. A Fabrique Nationale (FN), Model 509, 9mm semi-automatic pistol, serial number GKS0166223;
6. A Norinco, Model 22 A.T.D., .22 caliber semi-automatic rifle, serial number 422721;
7. A Radical Firearms, Model RF-15, multi-caliber semi-automatic rifle, serial number 21-081376;
8. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;

9. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
10. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0002-34894;
11. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0003-65582;
12. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0020-73510;
13. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 354-44453;
14. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 104682;
15. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 199352;
16. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 250-52250; and
17. A Ruger, Model M77, .243 caliber bolt-action rifle, serial number 784-79037.

All in violation of Title 18, United States Code, Sections 933(a)(1), 933(a)(3), and 933(b).

COUNT FOUR
[18 U.S.C. § 1956(h)]

From in or about July 2023 to on or about April 24, 2024, in the Northern District of Oklahoma and elsewhere, the defendants, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” **LETICIA GARCIA SALAZAR**, **DAISY VILLANUEVA**, **JAVIER RODARTE**, **RICARDO PLATEADO-MARTINEZ**, **ROSA MARIA OLMOS**, and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated, and agreed together, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, to knowingly conduct and attempt to conduct such financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, Distribution of Methamphetamine, a violation of Title 21, United States Code, Section 841(a)(1), and Conspiracy to Possess with Intent to Distribute and to Distribute Methamphetamine, a violation of Title 21, United States Code, Sections 846 and 841(a)(1), knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT FIVE
[18 U.S.C. §§ 1957(a) and 1957(b)]

On or about July 13, 2023, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly engaged in and attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and derived from specified unlawful activities. The specified unlawful activity was Drug Conspiracy, as set forth more fully in Count One of this Superseding Indictment.

All in violation of Title 18, United States Code, Sections 1957(a) and 1957(b).

COUNT SIX
[18 U.S.C. §§ 1957(a) and 1957(b)]

On or about August 2, 2023, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly engaged in and attempted to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 and derived from specified unlawful activities. The specified unlawful activity was Drug Conspiracy, as set forth more fully in Count One of this Superseding Indictment.

All in violation of Title 18, United States Code, Sections 1957(a) and 1957(b).

COUNT SEVEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about February 28, 2024, in the Northern District of Oklahoma, the defendant, **LETICIA GARCIA SALAZAR**, knowingly and intentionally distributed 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT EIGHT
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about March 11, 2024, in the Northern District of Oklahoma, the defendant, **DAISY VILLANUEVA**, knowingly and intentionally distributed 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT NINE
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about March 12, 2024, in the Northern District of Oklahoma, the defendant, **LETICIA GARCIA SALAZAR**, knowingly and intentionally distributed 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT TEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about March 12, 2024, in the Northern District of Oklahoma, the defendants, **ELISER BLANCO LOPEZ** and **ADAMARIS JIMENEZ**, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT ELEVEN
[21 U.S.C. §§ 856(a)(1) and 856(b)]

From on or about March 11, 2024, to on or about April 24, 2024, in the Northern District of Oklahoma, the defendant, **LETICIA GARCIA SALAZAR**, unlawfully and knowingly used and maintained a place located at 7215 South 92nd East Avenue, Apartment 2, Tulsa, Oklahoma, for the purpose of distributing methamphetamine, a Schedule II controlled substances.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNT TWELVE
[18 U.S.C. §§ 922(g)(5)(A) and 924(a)(8)]

On or about March 30, 2024, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowing he was then an alien illegally and unlawfully in the United States, knowingly possessed in and affecting interstate commerce the following firearms:

1. An Inter Ordnance (IO) Inc, Model 10-15, multi-caliber semi-automatic pistol, serial number 1015-02197;
2. An Anderson Manufacturing, Model AM-15, multi-caliber semi-automatic rifle, serial number 21121908;
3. A Beretta, Model 92F, 9mm semi-automatic pistol, serial number BER137788Z;
4. A Browning, Model SA-22, .22 Caliber semi-automatic rifle, serial number 10940RN146;
5. A Fabrique Nationale (FN), Model 509, 9mm semi-automatic pistol, serial number GKS0166223;
6. A Norinco, Model 22 A.T.D., .22 caliber semi-automatic rifle, serial number 422721;
7. A Radical Firearms, Model RF-15, multi-caliber semi-automatic rifle, serial number 21-081376;
8. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
9. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
10. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0002-34894;
11. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0003-65582;

12. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0020-73510;

13. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 354-44453;

14. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 104682;

15. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 199352;

16. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 250-52250; and

17. A Ruger, Model M77, .243 caliber bolt-action rifle, serial number 784-79037.

All in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

COUNT THIRTEEN
[18 U.S.C. § 924(c)(1)(A)(i)]

On or about March 30, 2024, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly possessed firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Drug Conspiracy, as set forth more fully in Count One of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FOURTEEN
[50 U.S.C. § 4819]

On or about March 30, 2024, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly and willfully attempted to export from the United States to Mexico the following items identified on the Commerce Control List:

1. An Inter Ordnance (IO) Inc, Model 10-15, multi-caliber semi-automatic pistol, serial number 1015-02197;
2. An Anderson Manufacturing, Model AM-15, multi-caliber semi-automatic rifle, serial number 21121908;
3. A Beretta, Model 92F, 9mm semi-automatic pistol, serial number BER137788Z;
4. A Browning, Model SA-22, .22 Caliber semi-automatic rifle, serial number 10940RN146;
5. A Fabrique Nationale (FN), Model 509, 9mm semi-automatic pistol, serial number GKS0166223;
6. A Norinco, Model 22 A.T.D., .22 caliber semi-automatic rifle, serial number 422721;
7. A Radical Firearms, Model RF-15, multi-caliber semi-automatic rifle, serial number 21-081376;
8. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
9. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
10. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0002-34894;
11. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0003-65582;

12. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0020-73510;

13. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 354-44453;

14. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 104682;

15. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 199352;

16. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 250-52250; and

17. A Ruger, Model M77, .243 caliber bolt-action rifle, serial number 784-79037,

which weapons were designated under Export Control Classification Number

0A501.a without first having obtained the required license and written approval from the United States Department of Commerce.

All in violation of Title 50, United States Code, Section 4819.

COUNT FIFTEEN
[18 U.S.C. § 924(k)(2)(B)]

On or about March 30, 2024, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” knowingly attempted to smuggle and take out of the United States the following firearms:

1. An Inter Ordnance (IO) Inc, Model 10-15, multi-caliber semi-automatic pistol, serial number 1015-02197;
2. An Anderson Manufacturing, Model AM-15, multi-caliber semi-automatic rifle, serial number 21121908;
3. A Beretta, Model 92F, 9mm semi-automatic pistol, serial number BER137788Z;
4. A Browning, Model SA-22, .22 Caliber semi-automatic rifle, serial number 10940RN146;
5. A Fabrique Nationale (FN), Model 509, 9mm semi-automatic pistol, serial number GKS0166223;
6. A Norinco, Model 22 A.T.D., .22 caliber semi-automatic rifle, serial number 422721;
7. A Radical Firearms, Model RF-15, multi-caliber semi-automatic rifle, serial number 21-081376;
8. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
9. A Remington Arms, Model 550-1, .22 caliber semi-automatic rifle, no serial number;
10. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0002-34894;
11. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0003-65582;

12. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 0020-73510;

13. A Ruger, Model 10/22, .22 caliber semi-automatic rifle, serial number 354-44453;

14. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 104682;

15. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 199352;

16. A Ruger, Model 10/22 Carbine, .22 caliber semi-automatic rifle, serial number 250-52250; and

17. A Ruger, Model M77, .243 caliber bolt-action rifle, serial number 784-79037,

with intent to engage in or to promote conduct that constitutes a felony, as that term is defined in Title 18, United States Code, Section 932(a).

All in violation of Title 18, United States Code, Section 924(k)(2)(B).

COUNT SIXTEEN
[8 U.S.C. § 1326]

On or about April 8, 2024, in the Northern District of Oklahoma, the defendant, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” an alien, was found in the United States after having been deported and removed therefrom on or about March 24, 2014, at or near Hidalgo, Texas, and having thereafter knowingly entered the United States without previously receiving the express consent of the proper legal authority to reapply for admission to the United States.

All in violation of Title 8, United States Code, Section 1326.

COUNT SEVENTEEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about April 24, 2024, in the Northern District of Oklahoma, the defendant, **LETICIA GARCIA SALAZAR**, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

FORFEITURE ALLEGATION

**[18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and (B), and 982(a)(1), 21 U.S.C. § 853,
28 U.S.C. § 2461(c) and 50 U.S.C. § 4819(d)]**

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1), 934(a)(1)(A) and (B), and 982(a)(1), Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c) and Title 50, United States Code, Section 4819(d).

Upon conviction of the offenses alleged in this Superseding Indictment, as a part of their sentences, the defendants, **GABRIEL URQUIZA-URQUIZA**, a/k/a “Gabriel Urquiza-Flores,” **LETICIA GARCIA SALAZAR**, **DAISY VILLANUEVA**, **JAVIER RODARTE**, **RICARDO PLATEADO-MARTINEZ**, **ELISER BLANCO LOPEZ**, **ADAMARIS JIMENEZ** and **ROSA MARIA OLMOS**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, any firearm and ammunition involved in or used in the knowing commission of such offenses, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the

property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Sections 924(d)(1), 934(a)(1)(A) and (B), and 982(a)(1), Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c) and Title 50, United States Code, Section 4819(d).

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL



DAVID A. NASAR
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson